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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
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PURDUE PHARMA L.P., <i>et al.</i> ,	:	Case No. 19-23649 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**PUBLIC CLAIMANTS' JOINDER TO DEBTORS' OBJECTION TO TIFFANY  
DUNFORD'S MOTION TO SHORTEN THE NOTICE PERIOD WITH RESPECT TO  
THE MOTION TO PERMIT THE FILING OF A CLASS PROOF OF CLAIM**

The (i) Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**Ad Hoc Committee**”), (ii) Ad Hoc Group of Non-Consenting States (the “**Non-Consenting States**”), and (iii) Multi-State Governmental Entities Group (the “**MSGE Group**,” and, together with the Ad Hoc Committee and the Non-Consenting States, the “**Public Claimants**”<sup>1</sup>), by and through their undersigned counsel, submit this joinder (the “**Joinder**”) to the *Debtors’ Objection to Tiffany Dunford’s Motion* (the “**Motion to Shorten**”) to Shorten the Notice Period with Respect to the Motion to Permit the Filing of a Class Proof of Claim [Dkt. No. 1432] (the “**Objection**”) and respectfully state as follows:

### **JOINDER**

The Public Claimants join in the Objection and the arguments set forth therein as if fully set forth herein. Counsel to Ms. Dunford can articulate no legitimate basis for having delayed in filing a motion for class certification, particularly where, as here, the very same counsel filed a similar motion on behalf of other claimants just over a week ago. Indeed, the untimeliness of the underlying motion for class certification should doom that motion on a substantive level, as well. *See generally In re Musicland Holding Corp.*, 362 B.R. 644, 656 (Bankr. S.D.N.Y. 2007) (declining to apply Rule 7023 where, inter alia, “the class claim would seriously delay the administration of the case, a fact exacerbated by the delay in making the certification motion”). The Court should be particularly loath to grant a motion to shorten time with respect to a motion that could have and should have been filed weeks, if not months, ago, and which bears almost no chance of success on the merits.

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<sup>1</sup> The members of the Ad Hoc Committee, the Non-Consenting States, and the MSGE Group are set forth in the 2019 statements filed, respectively, at Docket Numbers 279, 296, and 409.

Nothing contained herein shall constitute a waiver of any rights or remedies of the Public Claimants under title 11 of the United States Code or applicable law, including, without limitation, the right to (i) amend, modify, or supplement this Joinder, or (ii) raise any other additional arguments at a later date.

### **CONCLUSION**

The Public Claimants respectfully request that the Court (i) deny the Motion to Shorten and (ii) grant such other and further relief as this Court deems just and proper.

Dated: July 17, 2020

Respectfully submitted,

/s/ Kenneth H. Eckstein

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